

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re: New York City Policing
During Summer 2020 Demonstrations

20 Civ. 8924 (CM)(GWG)

This filing is related to:

ALL CASES

DECLARATION OF COREY STOUGHTON

I, COREY STOUGHTON, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am an attorney with The Legal Aid Society and the Attorney-in-Charge of Law Reform and Special Litigation in the Criminal Defense Practice. I am one of the attorneys representing plaintiffs Jarrett Payne, Andie Mali, Camila Gini, Vidal Guzman, Vivian Matthew King-Yarde; Charlie Monlouis-Anderle, James Lauren, Micaela Martinez, Julian Phillips, Nicholas Mulder, and Colleen McCormack-Maitland in this matter. I submit this declaration in support of Consolidated Plaintiffs' Opposition to Intervenor Police Benevolent Association's Motion to Reject the Settlement Agreement.

2. I was one of the attorneys representing the *Payne* plaintiffs at the mediation and settlement meetings and attended the vast majority of mediation and settlement meetings. Some of these sessions took place in person but most took place remotely. There were more than 50 mediation sessions and settlement meetings among counsel for the parties between July 2022 and September 5, 2023. The PBA was represented and present at the vast majority of these meetings.

3. Many parties did not attend all of the settlement meetings and mediation sessions; sometimes meetings related only to specific issues arising between two parties or were designed for a smaller group to make progress on an issue in order to bring it back to all parties.

4. Operative drafts of the agreement were shared by email with the PBA at all stages of the settlement discussions.

5. Attached as Exhibit 1 is a true and correct copy of an excerpt of the 30(b)(6) Deposition Transcript of Stephen Hughes, dated May 5, 2023.

6. Attached as Exhibit 2 is a true and correct copy of an excerpt of the Fact Deposition Transcript of Stephen Hughes, dated June 20, 2023.

7. Attached as Exhibit 3 is a true and correct copy of an excerpt of the Deposition Transcript of John D'Adamo, dated May 10, 2023.

8. Attached as Exhibit 4 is a true and correct copy of an excerpt of the Deposition Transcript of Terence Monahan, dated June 9, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Corey Stoughton
COREY STOUGHTON

Dated: November 3, 2023
New York, N.Y.